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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

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11 GINA CASTRONOVO-FLIHAN,

12 Plaintiff,

13 vs.

14 STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY, a foreign  
15 company; AND DOES I through V, inclusive

16 Defendants.

CASE NO. 2:20-cv-1197-JCM-DJA

**STIPULATION AND ORDER TO  
EXTEND MOTION IN LIMINE DATES  
AND CONTINUE TRIAL SETTING**

**[FIRST REQUEST]**

17 Plaintiff GINA CASTRONOVO-FLIHAN (“Plaintiff”), by and through her undersigned  
18 counsel of record, and Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE  
19 COMPANY (“Defendant”), by and through its undersigned counsel of record, hereby stipulate and  
20 agree, subject to the Court’s approval, as follows:

21 1. On September 22, 2023, this Court entered an Order [40] Granting Motion for  
22 Partial Summary Judgment. [54].

23 2. On October 19, 2023, Plaintiff and Defendant conducted a meet and confer to  
24 discuss the Joint Pre-Trial Order.

25 3. On October 26, 2023, this court entered an Order [58] extending time for the parties  
26 to file the Joint Pre-Trial Order.

27 4. On November 9, 2024, this court entered an Order [60] extending time for the parties  
28

1 to file the Joint Pre-Trial Order.

2 5. On November 20, 2023, this court entered the parties Joint Pre-Trial Order [62].

3 6. On December 4, 2023, this court entered the Order Setting Settlement Conference  
4 [64] which set the parties to attend a settlement conference on January 29, 2024 at 10:00am. The  
5 court set this matter for a court/jury trial on the stacked calendar on February 5, 2024 at 9:00am.

6 7. The parties are in the process of settlement discussions and request a brief  
7 continuance of trial so the parties do not incur irreversible costs and fees associated with trial  
8 preparation.

9 8. The parties are not requesting an extension of the settlement conference or due dates  
10 on their respective statements.

11 9. On January 5, 2024, Defendants filed three motions in limine. [66], [67], and [68].

12 10. The parties agree to extend the due date for Plaintiff to respond to Motions in Limine  
13 for two weeks after the Settlement Conference has ended, or until February 12, 2024.

14 11. One of the Defendant experts is unavailable the final week of February.

15 12. As such, the parties agree and respectfully request this Court to vacate the current  
16 February 5, 2024 trial date and move the trial date to the first available trial stack starting in March  
17 2024.

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1 DATED this 10th day of January, 2024.

MCMENEMY | HOLMES PLLC

2  
3 /s/ Ian M. McMenemy

IAN M. MCMENEMY

4 Nevada Bar No. 13190

1645 Village Center Circle, Suite 291

5 Las Vegas, NV 89134

Attorney for Plaintiff

6 GINA CASTRONOVO-FLIHAN

7 DATED this 10th day of January, 2024.

8 LEWIS BRISBOIS BISGAARD &  
SMITH LLP

9 /s/ Frank A. Toddre, II

10 ROBERT W. FREEMAN

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13 Attorneys for Defendant

14 STATE FARM MUTUAL AUTOMOBILE

INSURANCE COMPANY

15 **ORDER**

16 By agreement of the parties, the Plaintiff Responses to the Motions in Limine shall be set at  
17 February 12, 2024.

18 By agreement of the parties, that the current February 5, 2024 trial date shall be vacated  
19 and re-set to **March 11, 2024, at 9:00 a.m.**; the calendar call currently set for January 31, 2024, is  
20 vacated and reset to **March 6, 2024, at 1:30 p.m.**

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23 **IT IS SO ORDERED.**

24 DATED January 12, 2023.

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27 UNITED STATES DISTRICT JUDGE